

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

March 18, 2020

United States of America
v.
Eneas Ramos and Victor Martinez

Case No. 4:20mj0533

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 03/16/2020 in the county of Harris County in the SOUTHERN District of TEXAS, the defendant violated TITLE 8 U. S. C. § 1324(a)(1)(A)(v)(I), an offense described as follows:

Conspiring with others knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation and engages in any conspiracy to commit any of the preceding acts in violation of Title 8 United States Code, Section(s) 1324 (a)(1)(A)(v)(I) and 1324 (a)(1)(A)(iii).

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.



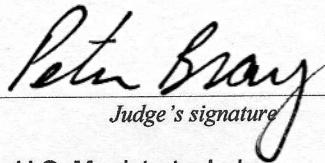
Complainant's signature

Randell S. Southland, Special Agent, HSI

Printed name and title

Sworn to me telephonically.

Date: March 18, 2020



Judge's signature

Peter Bray, U.S. Magistrate Judge

Printed name and title

City and state: Houston, Texas

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Randell S. Southland, being telephonically sworn, depose and state the following:

1. I am a Special Agent with Homeland Security Investigations (HSI). I have been so employed since 2004. Prior to that, I was an Immigration Agent with the Immigration and Naturalization Service (INS) from 1997 to 2004. I have extensive training and experience in alien smuggling investigations.
2. The information enumerated in the paragraphs below, furnished in support of this affidavit, is derived from my own observations and the observations of other law enforcement officers.
3. On March 16, 2020, Houston Police and Harris County Sheriff Office (HCSO) deputies executed a search and arrest warrant at 1704 Warwick Rd., Houston, TX 77093, following the report of an aggravated kidnapping at gun point of Liliana Romero. Romero informed officers that she had been at the La Haradura Club located at 833 Hill Road, Houston, TX until the early morning of March 16, 2020. Romero arrived at the club at approximately 0330 and proceeded to walk outside at 0630 when a male approached her from a vehicle and pulled a handgun, telling her to get into a 2007 black Dodge Charger in the parking lot. Romero stated that she feared for her life and complied. Romero stated that she didn't know the male, but he was Hispanic and drove her to 1704 Warwick Rd, Houston. Romero stated that upon arrival at the residence, the male told her to go inside to have sex. She said that he was speaking Spanish throughout the ordeal but that she wouldn't get out of the car. Romero stated that the male tried to force himself on her in the car, but she was able to hold him off. The male then tried to offer her money for oral sex which she refused.
4. Romero stated that since she wouldn't get out of the car, the male got back into the car and drove off. She stated that they drove north bound on the North Freeway to Gulf Bank where she was able to jump out of the car and run into the Gulf service station, noting she was not followed. During the incident, Romero was able to take a photograph of the driver with her phone camera and the license plate of the vehicle. Further, she was able to identify the location of the house she was taken to. After escaping, Romero contacted police who were able to obtain a warrant for the residence and vehicle.
5. Upon approach, officers saw the male suspect exit the residence. HCSO was able to take the subject into custody. He was identified through AFIS as Victor MARTINEZ (DOB: 7/20/1993). During the search of MARTINEZ's vehicle, identified as a 2007 black Dodge Charger bearing temporary Texas license plate 65622P3, officers found a fully loaded Ruger 40 caliber handgun, serial number 343-13339. HSCO advised MARTINEZ that they wanted to make sure nobody else was in the house. Officers approached the house and knocked on the door. At that time suspect RAMOS came out of the house. At the same time, people were

observed jumping out of the window near the rear of the residence. HCSO was able to take custody of three Sri-Lankan subjects, a Honduran and two Mexican nationals.

6. Homeland Security Investigations arrived at the Warwick Rd address at approximately 1900 hours. Agents conducted a brief on site interview of the Sri Lankan female who speaks passable English, Kajenthini ANATHAJEYAM (DOB: 1/19/1992). She explained that she, her husband/boyfriend and another Sri Lankan have been in the house for approximately one week after being bought to Houston from McAllen, TX. She stated that she had already paid the smuggling fare all the way from Sri Lanka to Ecuador and up through Mexico, claiming the final payment of \$4000 was made in Reynosa, Mexico two weeks ago. After crossing into the US, the three were dropped at a parking lot in McAllen where a Hispanic male driving a black Dodge Charger, identified as the vehicle above, picked them up and took them to the Warwick house. The female was able to identify Martinez visually, as he was still on scene during the time of the arrest. She stated that "he", MARTINEZ and another male (RAMOS) kept them locked in a bedroom and demanded more payment. She stated that MARTINEZ would point a gun at them and threaten to kill them if they didn't get more money. Further, she stated that they ate very little in the house, explaining that it had been over 24 hours since they had been fed or given water. The female Sri Lankan was clear that they were being held at gunpoint against their will for more payment.

7. Based on the statements made by the material witnesses on site, HCSO applied for and received a state search warrant for the residence at 0115 on 3/17/2020. The warrant was executed at approximately 0120. The house is described as a three-bedroom single floor dwelling. The Aliens were kept in the farthest room, to the rear of the house. They indicated that they were locked in the room. The room the aliens stayed in contained one air mattress on the floor for all of them with piles of their clothes on the floor. It was otherwise basically empty. During the search, agents and officers were looking for additional weapons and drugs that were described as seen and believed to still be present inside the residence, in addition to financial ledgers and documents indicative of alien smuggling. No weapons or significant drugs were found. Agents seized several phones and identification documents from the location including ten cellular phones found in the bottom drawer of the refrigerator, which contained no real edible food. The search was completed at approximately 0205am 3/17/2020.

8. Special Agent Suyapa Martin and Josh Martin conducted an interview of Kajenthini ANATHAJEYAM (DOB: 1/19/1992) a citizen and national of Sri Lanka in the Tamil language, utilizing phone translators. ANATHAJEYAM stated that she flew from Sri Lanka to Ecuador, then travelled by bus to Columbia. From Columbia to Panama ANATHAJEYAM walked with other migrants. At a camp in Panama, smugglers "handed me over" to Costa Rica and got her to Nicaragua. ANATHAJEYAM took a bus from Nicaragua to Guatemala and then river inner-tube from Guatamala to Mexico. She spent 25 days in a camp near Tapachula, Chiapas Mexico, where someone referred to as an "agent" said that the organization had not received money yet for her transportation. The "agent" took ANATHAJEYAM to a stash house where she was

pressed for the \$10,000 USD and kept under guard by at least 2 guards. ANATHAJEYAM claims that her aunt paid the required money after selling dwellings in Sri Lanka. ANATHAJEYAM was released from the stash house and transported by bus from San Luis Potosi to Reynosa, Mexico. From Reynosa, she took a taxi cab to another stash house where she was charged another \$4000. There were 2 others being smuggled who were in the taxi with her. ANATHAJEYAM remained under armed guard at this stash house for a month while she arranged for the transfer of money. After the money was paid, ANATHAJEYAM travelled from Reynosa to the US border where she made a river crossing early in the morning. In McAllen, TX ANATHAJEYAM was met on the US side of the river and taken to a stash house. There, ANATHAJEYAM spent approximately 15 days with no internet or phone access, while the people in the stash house asked for more money. On the 15th day at approximately 4 am, a red truck picked ANATHAJEYAM up from the stash house and drove her to Houston where she was taken to the stash house on Warwick Rd. ANATHAJEYAM stated that she arrived on Wednesday, 3/11/2020 and was locked inside a room. While she was never allowed outside, she claims that she was occasionally allowed to use the restroom. She claims that the men who watched over them had guns and would point them at the aliens. She counted at least three different guns. ANATHAJEYAM was provided a photo line up and identified RAMOS. ANATHAJEYAM described RAMOS as living in the house, sleeping on the couch. She stated that at night if she snuck from the bedroom into the restroom, she saw RAMOS sleeping on the couch with a pistol on his chest. ANATHAJEYAM identified RAMOS in a photo line up as one of the guards of the house with a gun.

9. Special Agent Suyapa Martin and Josh Martin conducted an interview of Darwin David REYES (DOB: 06/14/1992) a citizen and national of Honduras. The interview was conducted in the Spanish language. REYES stated he entered the United States on January 11, 2020, destined to Denver, Colorado to his sister-in-laws. REYES paid \$9000 to someone named Rolando in Honduras. He travelled by bus from Guatemala to the US/Mexico border where he crossed the river near Reynosa, Mexico by way of inner tubes. On the US side, he walked for hours through the brush at night where he was met by a single male driver that took him to a warehouse for one night. He was transported to three other stash houses around McAllen, TX over 18 days before being transported to Houston, TX. After arriving to the stash house on Warwick Rd, he was charged an additional \$5500 which was then lowered to \$3000. REYES stated that he saw the 2 male guards with guns, noting that one gun was frequently sitting on the tv desk and was platinum in color. REYES identified RAMOS in a photo line up as one of the guards who carried a gun in the house.

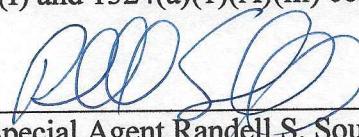
10. Special Agent Norma Martinez and Juan Benavides conducted an interview of SINNATHAMBY, Harekokulan a citizen and national of Sri Lanka in the Tamil language, utilizing phone translators. SINNATHAMBY stated that he left Sri Lanka on or about June 29, 2019 due to problems he was having in country ending up in prison, getting beaten up and consistently harassed by government officials. SINNATHAMBY did not mention a specific destination in the United States, only that he wishes to end up some place in America. He did state he knows someone in Canada. SINNATHAMBY explained that his parents paid \$20,000 for him to be smuggled into the United States. During his travel through Panama his cell phone and some money were stolen. When crossing the mountains in Panama by foot, armed robbers

stole more of his money, threatening to kill him if he didn't pay them. He purchased another phone when he finally reached Mexico that was taken when he arrived in the US. At the residence on Warwick Rd, SINNATHAMBY stated he was kept in a room that was locked from the outside. He had access to one bathroom with a toilet and an adjoining bathroom that had a shower. SINNATHAMBY stated the aliens would have to knock on the door to be allowed access to the bathroom. He described the guards of the house as one very fat and tall and the other short with curly hair. While he stated that he didn't personally see any weapons, he remained quiet and followed the rules and wasn't mistreated other than inconsistent food. SINNATHAMBY identified RAMOS as one of the guards on a photo line up.

11. Special Agent Norma Martinez and Juan Benavides conducted an interview of Kuganesan KIRUSHNARASA (DOB: 01/18/1995) a citizen and national of Sri Lanka in the Tamil language, utilizing phone translators. KIRUSHNARASA stated that he departed his country in July 2019 destined for Dallas, Texas. According to KIRUSHNARASA, he and his family paid \$7550 of the \$10,000 bill to start the smuggling event. KIRUSHNARASA believes he still owes a remaining \$2450. At the stash house in Houston on Warwick Rd, KIRUSHNARASA stated that he was regularly threatened that he would be killed if he didn't provide additional money. He identified the house guards as one tall and fat, Hispanic, the other was medium build, 27-28, wears glasses matching the description of Victor MARTINEZ. He stated that he saw the man with glasses carrying a gun and that he would point it at them, telling the aliens that he was the ruler of the house. KIRUSHNARASA described the gun as a black and white handgun. During a photo line-up, KIRUSHNARASA identified RAMOS as a guard, noting that he was usually at the house and that he didn't allow them outside or to use the bathroom. RAMOS was described as one of two people who demanded \$4000 from him, but he didn't have any money to give.

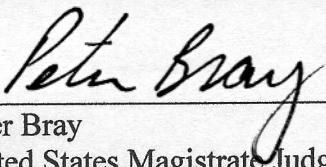
12. Special Agent Norma Martinez and Juan Benavides conducted an interview of Fernando TAPIA-Sanchez a citizen and national of Mexico. The interview was conducted in the Spanish language. TAPIA-Sanchez departed Morelia, Michoacán, Mexico on Saturday 3/14/200, destined for Houston, Texas with a final destination in Florida where his wife lives. TAPIA-Sanchez described multiple transports, stash houses and vehicles for his movement from McAllen, Texas to Houston, Texas. TAPIA-Sanchez stated that once at the stash house in Houston on Warwick Rd, two Hispanic males guarded the house, told him to stay in the room with the other aliens and not come out. During a photo line-up TAPIA-Sanchez positively identified RAMOS as one of the guards that watched them but would not provide additional information.

13. Based upon the evidence gathered from the investigation, I believe there is probable cause to believe that Eneas RAMOS and Victor MARTINEZ have violated Title 8, United States Code, Section 1324 (a) (1) (A) (v) (I) and 1324(a)(1)(A)(iii) conspiracy to harbor illegal aliens.



Special Agent Randell S. Southland
Homeland Security Investigations
Houston, Texas

Sworn telephonically at Houston, Texas on March 18, 2020 and I find probable cause.


Peter Bray
Peter Bray
United States Magistrate Judge